

MICHAEL A. CARDOZO
Corporation Counsel

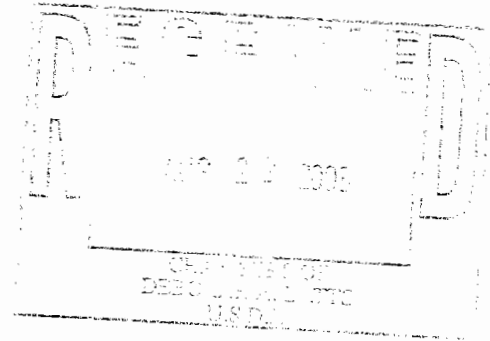
THE CITY OF NEW YORK
LAW DEPARTMENT
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NEW YORK, NY 10007-2601

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August 21, 2008

BY PERSONAL DELIVERY

Honorable Deborah A. Batts
United States District Judge
United States District Court
Southern District of New York
500 Pearl St., Room 2510
New York, NY 10007



Re: Ellis v. City of New York et. al.
08 CV 06705 (DAB)
Matter No. 2008-029437

Dear Judge Batts:

MEMO ENDORSED

I am the Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants City of New York ("City") and Department of Corrections ("DOC") (collectively "City Defendants") in the above-referenced action. I write to respectfully request that defendants time to respond to the complaint be extended from September 2 until October 17, 2008. This is City Defendants' first request for an enlargement of time.

DAB/
8/28/08
G. Green

Plaintiff brings this action pursuant to Title VII, 42 U.S.C. § 1983, the New York Constitution, N.Y. Exec. Law § 296, N.Y.C. Admin. Code 8-101, and the New York City Charter alleging that she was subjected to sexual harassment and a hostile work environment by defendants.

This extension of time is necessary to enable me to conduct a thorough investigation of plaintiff's allegations, consult with clients, and to prepare an appropriate response to the complaint. In addition, plaintiff has named Deputy Warden Raphael Olivo as a defendant in this action. This office will need time to make a determination under NY General Municipal Law § 50-k regarding the representation of Mr. Olivo once he has been served with a copy of the summons and complaint. I have consulted with plaintiff who consents to this

MEMO ENDORSED

request. Accordingly, City Defendants request that their time to respond to the complaint be extended from September 2 until October 3, 2008 and that the Court grant a similar extension for defendant Olivo to respond to the complaint.

I thank the Court for its consideration of this request.


Respectfully submitted,


Pinar Ozgu
Assistant Corporation Counsel

cc: Honorable James C. Francis (by mail)
United States Magistrate Judge

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SO ORDERED



DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE